

SERFF Tracking Number:	USPX-125694460	State:	Arkansas
First Filing Company:	United Services Automobile Association, ...	State Tracking Number:	EFT \$50
Company Tracking Number:	AUTAR00071CGF01		
TOI:	19.0 Personal Auto	Sub-TOI:	19.0001 Private Passenger Auto (PPA)
Product Name:	2008 Tier Program		
Project Name/Number:	2008 Tier Program/AUTAR00071CGF01		

Filing at a Glance

Companies: United Services Automobile Association, USAA Casualty Insurance Company, USAA General Indemnity Company, Garrison Property and Casualty Insurance Company

Product Name: 2008 Tier Program	SERFF Tr Num: USPX-125694460	State: Arkansas
TOI: 19.0 Personal Auto	SERFF Status: Closed	State Tr Num: EFT \$50
Sub-TOI: 19.0001 Private Passenger Auto (PPA)	Co Tr Num: AUTAR00071CGF01	State Status: Fees verified and received
Filing Type: Form	Co Status:	Reviewer(s): Alexa Grissom, Betty Montesi
	Author: SPI USAAPC	Disposition Date: 07/28/2008
	Date Submitted: 06/12/2008	Disposition Status: Approved
Effective Date Requested (New): 08/11/2008		Effective Date (New): 08/11/2008
Effective Date Requested (Renewal): 09/07/2008		Effective Date (Renewal): 09/07/2008

State Filing Description:

General Information

Project Name: 2008 Tier Program	Status of Filing in Domicile:
Project Number: AUTAR00071CGF01	Domicile Status Comments:
Reference Organization:	Reference Number:
Reference Title:	Advisory Org. Circular:
Filing Status Changed: 07/28/2008	
State Status Changed: 06/16/2008	Deemer Date:
Corresponding Filing Tracking Number: AUTAR00071CGR01	
Filing Description:	

We are implementing a storage discount for use with our personal auto policy. Currently, our members are offered a Comprehensive only policy (where available) when a vehicle is placed in storage. We propose offering an online self-storage discount available to members in all locations while retaining existing coverages. The discount offered will be 90% of the base rate for all coverages except Comprehensive. The base rate for Comprehensive will be discounted 25%. The rule and discount amounts are provided in our personal auto manual pages. We are introducing our Storage

<i>SERFF Tracking Number:</i>	<i>USPX-125694460</i>	<i>State:</i>	<i>Arkansas</i>
<i>First Filing Company:</i>	<i>United Services Automobile Association, ...</i>	<i>State Tracking Number:</i>	<i>EFT \$50</i>
<i>Company Tracking Number:</i>	<i>AUTAR00071CGF01</i>		
<i>TOI:</i>	<i>19.0 Personal Auto</i>	<i>Sub-TOI:</i>	<i>19.0001 Private Passenger Auto (PPA)</i>
<i>Product Name:</i>	<i>2008 Tier Program</i>		
<i>Project Name/Number:</i>	<i>2008 Tier Program/AUTAR00071CGF01</i>		

Endorsement A155CW(01) 05-08 for use with this discount. The endorsement reduces both liability to state financial responsibility limits and collision to a maximum of the lienholder's interest only if the vehicle is driven while the discount is present.

The corresponding rate/rule filing is being submitted under filing # AUTAR00071CGR01.

Company and Contact

Filing Contact Information

Scott Hawthorne, Compliance Analyst	scott.hawthorne@usaa.com
9800 Fredericksburg Road	(210) 498-5315 [Phone]
San Antonio, TX 78288-1033	(210) 498-5081[FAX]

Filing Company Information

United Services Automobile Association	CoCode: 25941	State of Domicile: Texas
9800 Fredericksburg Road	Group Code: 200	Company Type: Property & Casualty

ATTN: Insurance Regulatory Compliance, A-03-W

San Antonio, TX 78288-1033	Group Name: USAA Group	State ID Number:
(210) 498-8722 ext. [Phone]	FEIN Number: 74-0959140	

USAA Casualty Insurance Company	CoCode: 25968	State of Domicile: Texas
9800 Fredericksburg Road	Group Code: 200	Company Type: Property & Casualty

ATTN: Insurance Regulatory Compliance, A-03-W

San Antonio, TX 78288-1033	Group Name: USAA Group	State ID Number:
(210) 498-8722 ext. [Phone]	FEIN Number: 59-3019540	

USAA General Indemnity Company	CoCode: 18600	State of Domicile: Texas
9800 Fredericksburg Road	Group Code: 200	Company Type: Property & Casualty

ATTN: Insurance Regulatory Compliance, A-03-W

San Antonio, TX 78288-1033	Group Name: USAA Group	State ID Number:
(210) 498-8722 ext. [Phone]	FEIN Number: 74-1718283	

SERFF Tracking Number: *USPX-125694460* *State:* *Arkansas*
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TOI: *19.0 Personal Auto* *Sub-TOI:* *19.0001 Private Passenger Auto (PPA)*
Product Name: *2008 Tier Program*
Project Name/Number: *2008 Tier Program/AUTAR00071CGF01*

Garrison Property and Casualty Insurance CoCode: 21253 State of Domicile: Texas
Company
9800 Fredericksburg Road Group Code: 200 Company Type: Property &
Casualty
ATTN: Insurance Regulatory Compliance, A-03-W
San Antonio, TX 78288-1033 Group Name: USAA Group State ID Number:
(210) 498-8722 ext. [Phone] FEIN Number: 43-1803614

SERFF Tracking Number:	USPX-125694460	State:	Arkansas
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Company Tracking Number:	AUTAR00071CGF01		
TOI:	19.0 Personal Auto	Sub-TOI:	19.0001 Private Passenger Auto (PPA)
Product Name:	2008 Tier Program		
Project Name/Number:	2008 Tier Program/AUTAR00071CGF01		

Filing Fees

Fee Required?	Yes
Fee Amount:	\$50.00
Retaliatory?	No
Fee Explanation:	\$50 per form filing.
Per Company:	No

COMPANY	AMOUNT	DATE PROCESSED	TRANSACTION #
United Services Automobile Association	\$50.00	06/12/2008	20827597

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Correspondence Summary

Dispositions

Status	Created By	Created On	Date Submitted
Approved	Alexa Grissom	07/28/2008	07/28/2008

Objection Letters and Response Letters

Objection Letters				Response Letters		
Status	Created By	Created On	Date Submitted	Responded By	Created On	Date Submitted
Pending Industry Response	Alexa Grissom	06/24/2008	06/24/2008	SPI USAAPC	06/24/2008	06/24/2008
Pending Industry Response	Alexa Grissom	06/16/2008	06/16/2008	SPI USAAPC	06/19/2008	06/19/2008

Filing Notes

Subject	Note Type	Created By	Created On	Date Submitted
Status	Note To Reviewer	SPI USAAPC	07/23/2008	07/23/2008

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Disposition

Disposition Date: 07/28/2008
Effective Date (New): 08/11/2008
Effective Date (Renewal): 09/07/2008
Status: Approved
Comment:

Rate data does NOT apply to filing.

Overall Rate Information for Multiple Company Filings

Overall Percentage Rate Indicated For This Filing	0.000%
Overall Percentage Rate Impact For This Filing	0.000%
Effect of Rate Filing-Written Premium Change For This Program	\$0
Effect of Rate Filing - Number of Policyholders Affected	0

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<i>Project Name/Number:</i>	<i>2008 Tier Program/AUTAR00071CGF01</i>		

Item Type	Item Name	Item Status	Public Access
Supporting Document	Uniform Transmittal Document-Property & Casualty	Approved	Yes
Form	Storage Endorsement	Approved	Yes
Form	Storage Endorsement	Approved	Yes

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Product Name: 2008 Tier Program
Project Name/Number: 2008 Tier Program/AUTAR00071CGF01

Objection Letter

Objection Letter Status Pending Industry Response

Objection Letter Date 06/24/2008

Submitted Date 06/24/2008

Respond By Date

Dear Scott Hawthorne,

This will acknowledge receipt of your response for the captioned filing. Please define base location as used in your response. Additionally, please advise when liability limits would be utilized if the car is not driven.

Please feel free to contact me if you have questions.

Sincerely,

Alexa Grissom

Response Letter

Response Letter Status Submitted to State

Response Letter Date 06/24/2008

Submitted Date 06/24/2008

Dear Alexa Grissom,

Comments:

I meant to include this in the last objection response.

Response 1

Comments: The endorsement applies to a vehicle that is in storage and based in AR (regardless of its registration state). It's added to a policy when the customer chooses the optional Storage Discount. Today if a customer is not using his vehicle for an extended period of time, he can reduce his liability coverage to the minimum FR limits. Or he can remove liability altogether but then he'll have 30 days to complete a non-use affidavit and submit it to the AR Department of Finance once they learn that USAA has removed liability coverage, otherwise he'll get penalized for not having liability coverage. Our Storage Discount offers another option; it allows the member to reduce his premium while keeping his liability coverage intact in return for his agreement to not drive the vehicle, store it in a secure location and to notify us before he drives it again. The endorsement comes into play if he violates his agreement and drives the vehicle while receiving the Storage Discount. The endorsement will reduce his liability limits to the minimum FR limits for the base location but only if the vehicle is driven. While it's stored, he has his regular liability limits. The endorsement is a way for USAA to minimize our liability exposure while still keeping the customer legal with the state's

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Project Name/Number: *2008 Tier Program/AUTAR00071CGF01*
liability requirements.

Changed Items:

No Supporting Documents changed.

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Thank you.

Sincerely,
SPI USAAPC

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First Filing Company: United Services Automobile Association, ... State Tracking Number: EFT \$50
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Product Name: 2008 Tier Program
Project Name/Number: 2008 Tier Program/AUTAR00071CGF01

Objection Letter

Objection Letter Status Pending Industry Response
Objection Letter Date 06/16/2008
Submitted Date 06/16/2008
Respond By Date
Dear Scott Hawthorne,

This will acknowledge receipt of the captioned filing. Is the full coverage endorsement still an option for the insured? Also, is the submitted endorsement offered for titled, licensed vehicles? If so, please describe more clearly when this endorsement is attached to a policy.

Please feel free to contact me if you have questions.

Sincerely,
Alexa Grissom

Response Letter

Response Letter Status Submitted to State
Response Letter Date 06/19/2008
Submitted Date 06/19/2008

Dear Alexa Grissom,

Comments:

We have made a minor editorial change to the Storage Endorsement. Previously, the word "declarations" was not capitalized; however, on the revised form, it is now capitalized. In addition, in the last sentence, we have "unbolded" the words "or replace".

Response 1

Comments: The endorsement applies to a vehicle that is in storage and based in AR (regardless of its registration state). It's added to a policy when the customer chooses the optional Storage Discount. Today if a customer is not using his vehicle for an extended period of time, he can reduce his liability coverage to the minimum FR limits. Or he can remove liability altogether but then he'll have 30 days to complete a non-use affidavit and submit it to the AR Department of Finance once they learn that USAA has removed liability coverage, otherwise he'll get penalized for not having liability coverage. Our Storage Discount offers another option; it allows the member to reduce his premium while keeping his liability coverage intact in return for his agreement to not drive the vehicle, store it in a secure location and to notify us before he drives it again. The endorsement comes into play if he violates his agreement and drives the

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vehicle while receiving the Storage Discount. The endorsement will reduce his liability limits to the minimum FR limits for the base location but only if the vehicle is driven. While it's stored, he has his regular liability limits. The endorsement is a way for USAA to minimize our liability exposure while still keeping the customer legal with the state's liability requirements.

Changed Items:

No Supporting Documents changed.

Form Schedule Item Changes

Form Name	Form Number	Edition Date	Form Type	Action	Action Specific Data	Readability Score	Attach Document
Storage Endorsement	A155CW(01)	05-08	Endorsement/AmendmentNew/Conditions			0	A155CW(01).PDF

No Rate/Rule Schedule items changed.

Thank you.

Sincerely,
SPI USAAPC

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Product Name: *2008 Tier Program*
Project Name/Number: *2008 Tier Program/AUTAR00071CGF01*

Note To Reviewer

Created By:

SPI USAAPC on 07/23/2008 04:34 PM

Subject:

Status

Comments:

I noticed that the Rates/Rules filing was approved last week. Do you have a status for this filing?

Thank you.

Scott Hawthorne

SERFF Tracking Number: *USPX-125694460* State: *Arkansas*

First Filing Company: *United Services Automobile Association, ...* State Tracking Number: *EFT \$50*

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TOI: *19.0 Personal Auto* Sub-TOI: *19.0001 Private Passenger Auto (PPA)*

Product Name: *2008 Tier Program*

Project Name/Number: *2008 Tier Program/AUTAR00071CGF01*

Form Schedule

Review Status	Form Name	Form #	Edition Date	Form Type Action	Action Specific Data	Readability	Attachment
Approved	Storage Endorsement	A155CW(01)	05-08	Endorsement/Amendment/Conditions	New	52.00	A155CW(01).PDF
Approved	Storage Endorsement	A155CW(01)	05-08	Endorsement/Amendment/Conditions	New	0.00	A155CW(01).PDF

STORAGE ENDORSEMENT

This Endorsement forms a part of the auto policy to which it is attached. The coverage provided by this Endorsement is subject to all the provisions of the policy and amendments except as they are modified below. In the event of a conflict with provisions of the auto policy or other Endorsements or Amendments, provisions of this Endorsement will control.

PART E - GENERAL PROVISIONS

CHANGES

Paragraph A. of the Changes section is replaced in its entirety as follows:

- A. The premium is based on information **we** have received from **you** and other sources.
1. **You** agree to cooperate with **us** in determining if this information is correct and complete. **You** agree that if this information changes, or is incorrect or incomplete, **we** may adjust **your** premiums accordingly during the policy period.
 2. **Your** premium has been adjusted based on **your** representation that a stored vehicle exists as indicated on the declaration sheet which means that the vehicle(s) will not be driven. If a vehicle is in storage, you will not allow that vehicle to be operated without first removing this Endorsement. Except for the first seven days of this Endorsement or as provided in the Deployment provision, if the vehicle is operated while represented as being in storage:
 - a. **Our** limits of liability under Part A - Liability Coverage will be reduced to the minimum limits of _____ per person and _____ per accident for Bodily Injury and _____ for Property Damage, as required by law, for any stored vehicle.
 - b. **We** will not pay for any loss under any coverage of Part D - Physical Damage Coverage. However, if there is a loss payee shown on the declarations, **we** will pay under Collision Coverage or Comprehensive Coverage, the lesser of the following amounts to the loss payee:
 - (1) The **actual cash value**, as defined in Part D - Physical Damage Coverage, of the vehicle less **your** deductible; or
 - (2) The amount owed to the loss payee; or
 - (3) The amount to **repair or replace your covered auto**.

STORAGE ENDORSEMENT

This Endorsement forms a part of the auto policy to which it is attached. The coverage provided by this Endorsement is subject to all the provisions of the policy and amendments except as they are modified below. In the event of a conflict with provisions of the auto policy or other Endorsements or Amendments, provisions of this Endorsement will control.

PART E - GENERAL PROVISIONS

CHANGES

Paragraph A. of the Changes section is replaced in its entirety as follows:

- A. The premium is based on information **we** have received from **you** and other sources.
1. **You** agree to cooperate with **us** in determining if this information is correct and complete. **You** agree that if this information changes, or is incorrect or incomplete, **we** may adjust **your** premiums accordingly during the policy period.
 2. **Your** premium has been adjusted based on **your** representation that a stored vehicle exists as indicated on the Declarations sheet which means that the vehicle(s) will not be driven. If a vehicle is in storage, you will not allow that vehicle to be operated without first removing this Endorsement. Except for the first seven days of this Endorsement or as provided in the Deployment provision, if the vehicle is operated while represented as being in storage:
 - a. **Our** limits of liability under Part A - Liability Coverage will be reduced to the minimum limits of _____ per person and _____ per accident for Bodily Injury and _____ for Property Damage, as required by law, for any stored vehicle.
 - b. **We** will not pay for any loss under any coverage of Part D - Physical Damage Coverage. However, if there is a loss payee shown on the Declarations, **we** will pay under Collision Coverage or Comprehensive Coverage, the lesser of the following amounts to the loss payee:
 - (1) The **actual cash value**, as defined in Part D - Physical Damage Coverage, of the vehicle less **your** deductible; or
 - (2) The amount owed to the loss payee; or
 - (3) The amount to **repair** or replace **your covered auto**.

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Rate Information

Rate data does NOT apply to filing.

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Supporting Document Schedules

Satisfied -Name:	Uniform Transmittal Document-Property & Casualty	Review Status:	Approved	07/28/2008
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Comments:

Attachment:

P&C Transmittal Doc and Form Schedule.PDF


Property & Casualty Transmittal Document

1. Reserved for Insurance Dept. Use Only	2. Insurance Department Use only	
	a. Date the filing is received:	
	b. Analyst:	
	c. Disposition:	
	d. Date of disposition of the filing:	
	e. Effective date of filing:	
	New Business	
	Renewal Business	
	f. State Filing #:	
g. SERFF Filing #:		
h. Subject Codes		

3. Group Name	USAA Group				Group NAIC #	200
4. Company Name(s)	Domicile	NAIC #	FEIN #	State #		
United Services Automobile Association	TX	25941	74-0959140			
USAA Casualty Insurance Company	TX	25968	59-3019540			
USAA General Indemnity Company	TX	18600	74-1718283			
Garrison Property and Casualty Insurance Company	TX	21253	43-1803614			

5. Company Tracking Number	AUTAR00071CGF01
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Contact Info of Filer(s) or Corporate Officer(s) [include toll-free number]

6. Name and address	Title	Telephone #s	FAX #	e-mail
Scott Hawthorne, CPCU, ChFC, CLU 9800 Fredericksburg Road, ATTN: Insurance Regulatory Compliance, A-03- W San Antonio TX 78288- 1033	Compliance Analyst	800-531-8722	210-498-5081	scott.hawthorne@usaa.c om
7. Signature of authorized filer				
8. Please print name of authorized filer	Scott Hawthorne, CPCU, ChFC, CLU			

Filing Information (see General Instructions for descriptions of these fields)

9. Type of Insurance (TOI)	19.0 Personal Auto		
10. Sub-Type of Insurance (Sub-TOI)	19.0001 Private Passenger Auto (PPA)		
11. State Specific Product code(s) (if applicable) [See State Specific Requirements]			
12. Company Program Title (Marketing Title)			
13. Filing Type	<input type="checkbox"/> Rate/Loss Cost <input type="checkbox"/> Rules <input type="checkbox"/> Rates/Rules <input checked="" type="checkbox"/> Forms <input type="checkbox"/> Combination Rates/Rules/Forms <input type="checkbox"/> Withdrawal <input type="checkbox"/> Other (give description)		
14. Effective Date(s) Requested	New: 08/11/2008	Renewal: 09/07/2008	
15. Reference Filing?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
16. Reference Organization (if applicable)			

Effective March 1, 2007

17.	Reference Organization # & Title	
18.	Company's Date of Filing	06-12-2008
19.	Status of filing in domicile	<input checked="" type="checkbox"/> Not Filed <input type="checkbox"/> Pending <input type="checkbox"/> Authorized <input type="checkbox"/> Disapproved

Property & Casualty Transmittal Document

20.	This filing transmittal is part of Company Tracking #	AUTAR00071CGF01
21.	Filing Description [This area can be used in lieu of a cover letter or filing memorandum and is free-form text]	

We are implementing a storage discount for use with our personal auto policy. Currently, our members are offered a Comprehensive only policy (where available) when a vehicle is placed in storage. We propose offering an online self-storage discount available to members in all locations while retaining existing coverages. The discount offered will be 90% of the base rate for all coverages except Comprehensive. The base rate for Comprehensive will be discounted 25%. The rule and discount amounts are provided in our personal auto manual pages. We are introducing our Storage Endorsement A155CW(01) 05-08 for use with this discount. The endorsement reduces both liability to state financial responsibility limits and collision to a maximum of the lienholder's interest only if the vehicle is driven while the discount is present.

The corresponding rate/rule filing is being submitted under filing # AUTAR00071CGR01.

22.	Filing Fees (Filer must provide check # and fee amount if applicable.) [If a state requires you to show how you calculated your filing fees, place that calculation below]
<div style="margin-bottom: 20px;"> Check #: EFT Amount: \$50.00 </div> <div style="text-align: center; margin-top: 100px;"> Refer to each state's checklist for additional state specific requirements or instructions on calculating fees. </div>	

***Refer to each state's checklist for additional state specific requirements (i.e. # of additional copies required, other state specific forms, etc.)

FORM FILING SCHEDULE

(This form must be provided ONLY when making a filing that includes forms)
 (Do not refer to the body of the filing for the forms listing, unless allowed by state.)

1.	This filing transmittal is part of Company Tracking #	AUTAR00071CGF01
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2.	This filing corresponds to rate/rule filing number (Company tracking number of rate/rule filing, if applicable)	Rate:AUTAR00071CGR01 Rule:AUTAR00071CGR01
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3.	Form Name /Description/Synopsis	Form # Include edition date	Replacement Or Withdrawn?	If replacement, give form # it replaces	Previous state filing number, if required by state
01	Storage Endorsement	A155CW(01) 05-08	<input checked="" type="checkbox"/> New <input type="checkbox"/> Replacement <input type="checkbox"/> Withdrawn		
02			<input type="checkbox"/> New <input type="checkbox"/> Replacement <input type="checkbox"/> Withdrawn		
03			<input type="checkbox"/> New <input type="checkbox"/> Replacement <input type="checkbox"/> Withdrawn		
04			<input type="checkbox"/> New <input type="checkbox"/> Replacement <input type="checkbox"/> Withdrawn		
05			<input type="checkbox"/> New <input type="checkbox"/> Replacement <input type="checkbox"/> Withdrawn		
06			<input type="checkbox"/> New <input type="checkbox"/> Replacement <input type="checkbox"/> Withdrawn		
07			<input type="checkbox"/> New <input type="checkbox"/> Replacement <input type="checkbox"/> Withdrawn		
08			<input type="checkbox"/> New <input type="checkbox"/> Replacement <input type="checkbox"/> Withdrawn		
09			<input type="checkbox"/> New <input type="checkbox"/> Replacement <input type="checkbox"/> Withdrawn		
10			<input type="checkbox"/> New <input type="checkbox"/> Replacement <input type="checkbox"/> Withdrawn		
11			<input type="checkbox"/> New <input type="checkbox"/> Replacement <input type="checkbox"/> Withdrawn		